

**THE INSTITUTE FOR JUSTICE**

Joseph Gay\*  
jgay@ij.org  
Robert Frommer\*  
rfrommer@ij.org  
901 N. Glebe Rd. Suite 900  
Arlington, VA 22203  
Tel. (703) 682-9320

Robert E. Johnson\*  
rjohnson@ij.org  
16781 Chagrin Blvd. Suite 256  
Shaker Heights, OH 44120  
Tel. (703) 682-9320

\* Admitted *pro hac vice*.

**THE VORA LAW FIRM, P.C.**

Nilay U. Vora (SBN 268339)  
nvora@voralaw.com  
Jeffrey Atteberry (SBN 266728)  
jatteberry@voralaw.com  
201 Santa Monica Blvd., Ste. 300  
Santa Monica, California 90401  
Tel. (424) 258-5190

*Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

**JENI PEARSONS and MICHAEL  
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;  
and Federal Bureau of Investigation  
Special Agents LYNNE ZELLHART,  
KATHRYN BAILEY DRESS,  
BRENT JAMES, WALTER DIX,  
RYAN HEATON, and LESLEY  
BUCHAN, in their individual  
capacities,**

Defendants.

Case No. 2:23-cv-07952-RGK-MAR

**[PROPOSED] ORDER GRANTING  
MOTION FOR EXTENSION OF  
TIME FOR SERVICE**

*(Filed concurrently with Notice of  
Motion for Extension of Time for  
Service and Memorandum in Support,  
and Declaration of Joseph Gay)*

Date: January 22, 2024

Time: 9:00 a.m.

Courtroom: 850

Judge: Hon. R. Gary Klausner

Complaint Filed: Sept. 22, 2023

Am. Complaint Filed: Dec. 19, 2023

1 On consideration of Plaintiffs' Motion for Extension of Time for Service and  
2 accompanying memorandum and declaration, it is hereby ORDERED that the  
3 motion is GRANTED. The Court finds that there is good cause under Federal Rule  
4 of Civil Procedure 4(m) to extend the 90-day deadline to serve Defendants Dress,  
5 James, Dix, Heaton, and Buchan, and that two weeks is an appropriate period to  
6 extend the service deadline.

7 Accordingly, the Court ORDERS that Plaintiffs shall serve Defendants  
8 Dress, James, Dix, Heaton, and Buchan by January 4, 2024, unless following  
9 further motion and a showing of good cause this Court further extends the deadline  
10 for service.

11  
12 Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

13  
14 \_\_\_\_\_  
15 The Honorable R. Gary Klausner  
16 United States District Judge  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28